

## **REMARKS / ARGUMENTS**

### **Disposition of the Claims**

The present response is intended to be a full and complete response to the Final Office Action mailed February 18, 2010. Claims 7 to 20 are pending in the present application. Applicants respectfully request continued examination and allowance of all pending claims.

### **Amendments to the Specification**

Applicants note that additional amendments to the specification are submitted here with in order to place the current application in compliance with US practice. Accordingly, applicants respectfully request entry of said amendment to the specification.

### **Amendments to the Claims**

Claim 10 has been redirected in independent form. Claim 14 has been amended to correct dependency. Claim 7 and 19 have been amended to indicate that a substrate passing through would first come in contact with the labyrinth system followed by the means for injecting an inert gas followed by the channel.

### **Objections to the Claims**

The Examiner objects to Claim 14 as the claim depends upon a canceled claim. Claim 14 has been amended to now depend upon claim 10. Accordingly, applicants respectfully request that this objection be withdrawn.

### **Allowable Subject Matter**

Applicants thank the Examiner for giving notice that claims 10 and 15 to 18 would be allowable if rewritten in independent form to include all of the limitations of the base claim and any intervening claims and that claim 20 is allowed. Claim 10 has been redrafted in independent form. Accordingly, applicants submit that claim 10 is now in allowable form. Claims 15 to 18 each depend either directly or indirectly from newly amended claim 10. As such, applicants submit that claims 15 to 18 are also in allowable form.

### 35 U.S.C. § 102(b) Rejection

The Examiner rejects claims 7 to 9, 11 to 14, and 19 under 35 U.S.C. 102(b) as being anticipated by Cocolios et al. (US 6,458,330). This rejection is respectfully traversed with regard to claims 7 to 9, 11 to 14, and 19, as amended.

Applicant maintains that claims 7 to 9, 11 to 14 and 19, as amended, are patentable over Cocolios since Cocolios teaches the reverse of what is presently claimed.

In the embodiment of the present invention as set forth in claim 7, it is clearly noted that the entry device adjacent the chamber comprises at least the following three components: a labyrinth system, means for injecting an inert gas forming a gas knife, and a channel. Accordingly, a substrate passing through would come into contact with each of these in the order noted within the claim. More specifically, a substrate passing through would first come in contact with the labyrinth system followed by the means for injecting an inert gas followed by the channel.

Cocolios describes an apparatus with an entry device that consists of three components positioned in series and seen in succession by the treated substrate, namely a channel, a gas injection slot and a labyrinth. The present invention differs from Cocolios in that in the present invention includes an entry device that comprises at least a labyrinth system followed by a means for injecting an inert gas forming a gas knife followed by a channel. A side by side comparison of the two installations clearly reveals differences in the two inventions with regard to the route taken by the product to be treated as it passes through the entry device:

Present Invention	Cocolios
Entry device comprises:	Entry device comprises:
1) a labyrinth system followed by	1) a channel followed by
2) a means for injecting an inert gas forming a gas knife followed by	2) a gas injection slot followed by

3) a channel

3) a labyrinth

In other words, a substrate passing through the present invention would first come in contact with the labyrinth followed by the means for injecting an inert gas followed by the channel compared to the invention of Cocolios which describes a substrate passing through the channel followed by the gas injection slot followed by the labyrinth. By making such modifications, Applicants were able to overcome technical problems associated with the use of the invention of Cocolios.

In view of the above, Applicants maintain that 7 to 9, 11 to 14 and 19, as amended, are not anticipated by Cocolios and therefore respectfully request withdrawal of the 35 U.S.C. § 102(b) rejection.

### **35 U.S.C. § 103(a) Rejection**

The Examiner rejects Claims 7 to 9, 11 to 14 and 19 under 35 U.S.C. § 103(a) as being unpatentable over Turnbull et al., U.S. Patent No. 3,931,684 (hereinafter “Turnbull”) in view of Cocolios. This rejection is respectfully traversed with regard to claims 7 to 9, 11 to 14 and 19, as amended.

The Examiner states that Turnbull teaches a curing chamber by radiation or electron beam but goes on to state that Turnbull does not teach an installation comprising a chamber having UV radiation or a source of accelerated electrons and the three components (labyrinth system, means for injection of an inert gas and a channel) in succession by the running product as claimed by Applicant. The Examiner relies upon Cocolios for the deficiencies of Turnbull stating that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to include a curing chamber with UV radiation or a source of accelerated electrons to cure the coated substrate” and that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to arrange the three components in Turnbull et al to improve installation of a chamber and to control over the treatment of

gaseous atmosphere inside the chamber as taught by Cocolios et al". Applicants respectfully disagree.

Turnbull does not teach an installation comprising a chamber having UV radiation or a source of accelerated electrons and the three components (labyrinth system, means for injection of an inert gas and a channel) in succession by the running product as claimed by Applicants. Cocolios does not overcome the deficiencies of Turnbull since Cocolios teaches a substrate passing through the channel followed by the gas injection slot followed by the labyrinth-- the exact opposite of what is claimed by Applicants. More specifically, Applicants claim an entry device in which a substrate passing through would first come in contact with the labyrinth system followed by the means for injecting an inert gas followed by the channel. This is the exact opposite of what Cocolios teaches.

Applicants maintain that one skilled in the art considering Turnbull in view of Cocolios would not have considered the present claims obvious since Cocolios teaches a completely different succession from that which is currently claimed by Applicants. One skilled in the art considering Turnbull in view of Cocolios would instead have concluded that the route taken by the substrate would be a channel followed by a gas injection slot followed by a labyrinth. There is nothing within Turnbull or Cocolios which would lead one to believe that by completely reversing the order of the channel, gas injection slot, and labyrinth with regard to the route of the substrate, improvements over the prior art would be obtained.

In view of the above, Applicants maintain that claims 7 to 9, 11 to 14 and 19, as amended, are clearly patentable over Turnbull in view of Cocolios. Accordingly, Applicants respectfully request that the rejection of claims 7 to 9, 11 to 14 and 19, as amended, under 35 U.S.C. § 103(a) be withdrawn.

## CONCLUSION

In view of the above, Applicants maintain that all of the pending claims are now in condition for allowance. Early notice to this effect is earnestly solicited. Should the Examiner believe a telephone call would expedite the prosecution of the present application, the Examiner is invited to call the undersigned attorney at the number listed below.

Applicants do not believe that any fee is due at this time. However, in the event that any additional fees are due, the Commissioner is authorized to debit deposit account number 01-1375 for the amount due.

Respectfully submitted,



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